



March 25, 2022

VIA ECF

Hon. Analisa Torres
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Ramon Abreu v. Torti Food, Corp., et al.*
Docket No.: 20-cv-10643 (AT)

Dear Judge Torres:

This firm represents Plaintiff Ramon Abreu, who brought the above-referenced matter against Defendants Torti Food, Corp., LMP Coffee Shop Inc., Demetria Chapman and Jose Perez (collectively as "Defendants"), his former employers, for violations of the Fair Labor Standards Act and New York Labor Law. The parties have reached a settlement in principle. As a result, the Court entered an order directing the parties to submit a motion for approval of the parties' settlement agreement, pursuant to Cheeks v. Freeport Pancake House, Inc., 796 F.3d 199 (2d Cir. 2015), with respect to Plaintiff's FLSA claims by March 28, 2022. Since that order, the parties encountered certain disputes regarding the terms of their settlement. Additionally, certain parties and attorneys were out of the office for periods of time that delayed progress finalizing the parties' settlement. As such, the parties require additional time to complete negotiations regarding the terms of their formal settlement agreement. Once finalized, the parties will require time to arrange for all parties to sign the formal settlement agreement and prepare their motion for approval. Accordingly, Plaintiff requests, with Defendants consent, an extension of time from March 28, 2022 until April 25, 2022 to submit Plaintiff's motion for approval. This is Plaintiff's first request for the relief sought.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ David D. Barnhorn, Esq.
DAVID D. BARNHORN, ESQ.

GRANTED.

SO ORDERED.

Dated: March 28, 2022
New York, New York

ANALISA TORRES
United States District Judge